



# COUNTY OF YOLO

## Board of Supervisors

District 1, **Michael H. McGowan**  
District 2, **Don Saylor**  
District 3, **Matt Rexroad**  
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District 5, **Duane Chamberlain**

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County Administrator, **Patrick S. Blacklock**  
Deputy Clerk of the Board, **Julie Dachtler**

August 5, 2011

Honorable Don Nottoli, Chair  
Delta Protection Commission  
Sacramento County  
700 H Street, Room 2450  
Sacramento, California 95814

Mike Machado, Executive Director  
Delta Protection Commission  
14215 River Road  
P.O. Box 530  
Walnut Grove, CA 95690

**RE: Comments of the County of Yolo on the July 21, 2011 "Public Draft" of the  
Economic Sustainability Plan for the Sacramento- San Joaquin Delta**

Dear Chair Nottoli and Mr. Machado:

We appreciate the opportunity to review the first public draft of the Economic Sustainability Plan ("Plan"). We especially appreciate the consultant team's hard work to address issues raised by Yolo County and others in a very short period of time.

This version of the plan is improved from the prior version, but still does not fully justify some of the Plan's conclusions or explain the methodologies used to reach these conclusions. (For specific examples, please contact our staff and refer to our comment letter on the administrative draft.) Since this plan is so critical to future successful economic development in the Delta and the credibility of the report is of paramount concern to Yolo County, we again urge a peer review of the entire report. While we understand the need to provide the Delta Stewardship Council with the report in September, it will take significant additional time to fully develop and then integrate the Plan's recommendations into existing planning documents. It is therefore worthwhile to engage in a peer review process, even if it takes place after the September deadline. If such peer review is not possible, we request an explanation in writing.

In addition to our request for peer review, we have the following comments of primary importance to Yolo County:

1. Re: Establishing a firm cap on Delta agricultural losses (Page 241). We note that the DPC deleted this recommendation during its July 28 discussion, but we believe it should be replaced with the following two recommendations:

“Establish a policy to avoid or minimize impacts on Delta agriculture caused by actions to increase export water supply reliability and related efforts to improve habitat. The policy will emphasize that if agricultural impacts are reasonably foreseeable and unavoidable, affected parties will agree on a process to identify impacts, work to minimize impacts, and develop associated measures to fully mitigate any remaining impacts, including economic impacts. ”

“Ensure no loss in the net value of Delta agriculture. While some loss of Delta agricultural acreage may be unavoidable if proposed actions move forward, it should be possible to increase the value of crops on remaining agricultural land. The trend in Delta agriculture is already towards higher value crops.”

2. RE: Creating flood bypass and habitat improvements in the Yolo Bypass (Page 242). We recommend the following specific wording:

Change “create” to “Explore flood bypass and habitat improvements in the Yolo Bypass, near the confluence of the Mokelumne and Consumnes River, and for the San Joaquin River near Paradise Cut.”

Change the sentence on the Yolo Bypass in this paragraph to the following, “Any proposal to improve fish habitat in the Yolo Bypass should closely engage local stakeholders and avoid or minimize impacts on flood protection, agriculture, endangered terrestrial species, and waterfowl, including the Yolo Wildlife Area. Any Yolo Bypass improvements also should be designed to enhance recreational opportunities. Finally, any proposed project should include mitigation for impacts, including economic impacts.”

Also, there is language on Page 79 related to a locally developed alternative proposal in Yolo County. This is not quite right. Yolo County is working with the state’s BDCP Yolo Bypass Fisheries Enhancement Planning Team to develop a proposed project that minimizes or avoids impacts to existing land uses.

3. Re: Creating the Delta Investment Fund (Page 242).

The Delta Investment Fund should be used to implement agricultural economic development strategies, as well as recreation and tourism.

4. Re: creating new entities to implement several of the recommendations in this plan: We concur with the apparent sentiment of several DPC commissioners that new entities should not be created to implement the Plan’s various recommendations. In particular, the Delta Protection Commission should itself take on or recommend an existing entity as the facilitator for tourism development, as the coordinator for regional emergency management and response, as manager of the National Heritage Area, and as operator of the Delta Investment Fund. We agree that there are

already a plethora of multi-layered regulatory and coordination entities in the Delta. New organizations need not be created.

5. Re: ensuring specific policies are developed to help improve economic sustainability in the Delta and implement the recommendations in the Plan.

We continue to be disappointed with the lack of specific policies to improve economic sustainability for which Delta entities could request immediate action or assistance. As a result, we suggest that this Plan recommend the DPC and each Delta county develop a follow-up implementation strategy with specific action items. The County implementation strategies will focus on economic development issues unique to individual counties, such as the Clarksburg Agricultural District, and the DPC strategy will focus on economic development issues the five counties have in common. The recommendation should specify the funding needed to develop these six implementation strategies, including funding for each of the Delta counties and the DPC.

Again, thank you for the opportunity to comment. We will continue to be actively engaged as future drafts are developed. We further encourage you to utilize the existing Delta Protection Commission Subcommittee on the Economic Sustainability Plan to provide feedback before the release of the next draft and to advise on a peer review process.

Sincerely,

A handwritten signature in black ink that reads "Matt Rexroad". The signature is written in a cursive, slightly slanted style.

Matt Rexroad

Chair, Yolo County Board of Supervisors

cc: Senator Lois Wolk  
Assemblyman Jim Nielsen  
Assemblywoman Mariko Yamada

